

Dear FCC,

Hello, my name is Priscilla Warren and I wanted to make a statement to the FCC about its current standards for license renewals as discussed in the NOI over localism.

I feel that the current standards via the 1980s deregulation as well as the Telecommunications Act of 1996 have created a very lax environment in the procedures of license renewals, too lax in my opinion. I feel that only requiring licensees to submit a "postcard renewal" and not holding them accountable for the information submitted on that "postcard" is a travesty. As well as only conducting reviews of licensees every eight years and switching from an active review of licensees to a more passive role based on petitions to deny and license certifications is wrong. Also, eliminating the comparative renewal process enacted by the Telecommunications Act of 1996 was detrimental to the license renewal process.

I am a full-time college student and dancer for the UTA Dance Team. While I realize that dancing for the school is an extra-curricular activity, I did have to audition for that position much like a person who wanted to broadcast would need to apply for a license to be able to broadcast on any kind of media outlet. Further drawing from my experiences on the dance team, I am held accountable for the grades I make while studying at UTA and must maintain a certain GPA to remain an active member of the dance team. This accountability is obtained through "grade-checks" at mid-semester, every semester which are verified for accuracy. I think it only fair to subject licensees to renewal standards just as strict as the ones student athletes are held to in universities and lower level educational facilities around the country. So, I feel that license renewals should first, be more difficult to obtain and second, the procedures used to evaluate whether a licensee should receive a renewal should be verified.

It was stated in the NOI over localism that "In the past, licenses were granted for a relatively short period - three years - and the Commission played an active role in evaluating licensee performance during the prior license term". Well hello, if it could be done before why isn't it being done now? I know you're answer is "time", there's not enough time to review licensees every three years but I feel it's imperative if you don't want more situations like Janet Jackson showing here breast to millions of viewers at last year's Super Bowl or Howard Stern allowing one political candidate running for the California Governor's office to come on his show while not allowing all the other hundred or so candidates to appear as well. I feel that the standard should be even stricter and have licensees reviewed every year and have license renewals conducted once a year. The benefit to this proposed change would be catching any mischievous conduct by licensees hopefully before it hits the public. The burden to this proposed change would be that, you're right, it would take more time but I feel that it's necessary if you take a look at the way broadcasters have taken advantage of the lack of enforcement on licensees by abusing the different media outlets in various ways.

I feel that the way in which the FCC should evaluate and hold licensees accountable was sufficient prior to the 1980s deregulation and the Telecommunications Act of 1996. As stated in the NOI over localism, "Applicants were required to submit substantial amounts of programming and other data - including

details of ascertainment efforts and commercial time figures - with their renewal application and the Commission reviewed this information using specific processing guidelines". I also agree with the way in which competing applicants could file against a renewal application prior to the 1980s deregulation and the Telecommunications Act of 1996. As stated in the NOI over localism, "Furthermore, competing applications could be filed against a renewal application. Where such applications were filed, the Commission undertook a comparative analysis to determine which licensee, the incumbent or the challenger, would provide the best service to the public". I do not however agree with the current standards set by the Telecommunications Act of 1996 that state "Only if the Commission denies a renewal application because it fails to meet the statutory standard may it accept applications for the license from other applicants". In limiting new applicants in this way you are shutting out any possibility of change. Change can be good and maybe for the better if the challenger has something better or more important to say than the incumbent. This statement also sets boundaries on the scope of evaluation and limits the FCC's authority. I feel that the only boundaries that should be set for the scope of evaluation of license renewals are those stated in the NOI over localism prior to the deregulation of the 1980s and the Telecommunications Act of 1996.

So in conclusion, I propose that the FCC go back to its traditional ways of issuing license renewals prior to the deregulation period of the 1980s as well as the Telecommunications Act of 1996 with one change. The change being that licensees are reviewed every year and there are license renewals conducted every year.

Thank you for your time,
Priscilla Warren